

IN THE DISTRICT COURT OF THE UNITED STATES  
FOR THE DISTRICT OF SOUTH CAROLINA  
SPARTANBURG DIVISION

UNITED STATES OF AMERICA )

CRIMINAL NO.: 7:22-779

-versus-

MARLON MICHAEL BRUFF,

a/k/a "Big Bro"

RAMARO ALSWORTH HIGGINS,

a/k/a "Dre"

LIONEL MARTIN ROSENADA

CABALLERO,

a/k/a "Mr. Hustler"

18 U.S.C. § 2

18 U.S.C. § 371

18 U.S.C. § 922(a)(1)(A)

18 U.S.C. § 922(g)(1)

18 U.S.C. § 922(h)

18 U.S.C. § 922(k)

18 U.S.C. § 923(a)

18 U.S.C. § 924(a)(1)(B)

18 U.S.C. § 924(a)(2)

18 U.S.C. § 924(a)(1)(D)

18 U.S.C. § 924(d)(1)

18 U.S.C. § 924(e)

21 U.S.C. § 841(a)(1)

21 U.S.C. § 841(b)(1)(D)

21 U.S.C. § 846

21 U.S.C. § 853

21 U.S.C. § 881

28 U.S.C. § 2461(c)

SEALED INDICTMENT

COUNT 1

THE GRAND JURY CHARGES:

1. That beginning at a time unknown to the grand jury, but beginning from at least in or around June of 2020, and continuing thereafter, up to and including the date of this Indictment, in the District of South Carolina and elsewhere, Defendants **MARLON MICHAEL BRUFF, a/k/a "Big Bro,"** **RAMARO ALSWORTH HIGGINS, a/k/a "Dre,"** **LIONEL MARTIN ROSENADA CABALLERO, a/k/a "Mr. Hustler,"**

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██████████ knowingly and willfully did combine, conspire, confederate, and agree together and with others known and unknown to the grand jury, to commit the following violations:

- a. To engage in the business of dealing in firearms without a license, in violation of Title 18, United States Code, Section 922(a)(1)(A);
- b. To make false statements with regard to the acquisition of firearms from licensed firearm dealers, in violation of Title 18, United States Code, Section 922(a)(6);
- c. To knowingly possess and receive firearms that had been shipped and transported in interstate and foreign commerce from which manufacturer's serial number had been removed, altered, and obliterated, in violation of Title 18, United States Code, Sections 922(k) and 924(a)(1)(B);
- d. To transfer and dispose of firearms to persons they knew and had reasonable cause to know had been convicted of a crime punishable by imprisonment for a term exceeding one year, in violation of Title 18, United States Code, Section 922(d)(1); and,
- e. To ship, transport, and receive firearms and ammunition in interstate and foreign commerce with knowledge and reasonable cause to believe any other felony offense punishable by a term exceeding one year is to be committed, in violation of Title 18, United States Code, Section 924(b).

### MANNER AND MEANS

2. It was part of the conspiracy that Defendants **MARLON MICHAEL BRUFF, a/k/a “Big Bro,”** [REDACTED] **RAMARO ALSWORTH HIGGINS, a/k/a “Dre,”** and [REDACTED] would recruit, pay, and receive firearms from straw purchasers and from individuals who knew that they were acquiring firearms that would be used to commit felony offenses;

3. It was further part of the conspiracy that Defendants **LIONEL MARTIN ROSENADA CABALLERO, a/k/a “Mr. Hustler,”** [REDACTED] [REDACTED], and others both known and unknown to the grand jury, would by dishonest means, procure firearms, under the guise of purchasing firearms for themselves, when in fact, the firearms were intended to be sold and used by others;

4. It was further part of the conspiracy that Defendants **LIONEL MARTIN ROSENADA CABALLERO, a/k/a “Mr. Hustler”** and [REDACTED] [REDACTED] would knowingly transfer firearms to individuals they knew and had reasonable cause to know had been convicted of a crime punishable by imprisonment for a term exceeding one year and would transfer and receive firearms knowing that other felony offenses were to be committed;

5. It was a further part of the conspiracy that Defendant [REDACTED] would, in the District of South Carolina, receive firearms from Defendant [REDACTED] [REDACTED] and others, both known and unknown to the grand jury, would obliterate the serial numbers from the firearms, and would transfer the firearms to Defendant **MARLON MICHAEL BRUFF, a/k/a “Big Bro”**;

6. It was a further part of the conspiracy that Defendants **MARLON MICHAEL BRUFF, a/k/a "Big Bro," RAMARO ALSWORTH HIGGINS, a/k/a "Dre,"** [REDACTED] would travel to and from South Carolina to transport the firearms across interstate lines to deliver firearms to various other states and to smuggle the firearms into Canada; and

7. It was further part of the conspiracy that Defendants **MARLON MICHAEL BRUFF, a/k/a "Big Bro,"** [REDACTED] **RAMARO ALSWORTH HIGGINS, a/k/a "Dre," LIONEL MARTIN ROSENADA CABALLERO, a/k/a "Mr. Hustler,"** and [REDACTED] would engage in the business of dealing in firearms without a license.

#### OVERT ACTS

8. In furtherance of the conspiracy and to affect the objects of the conspiracy, the following overt acts, among others, were committed in the District of South Carolina and elsewhere:

- a. From in or about June of 2020, and continuing thereafter, up to and including the date of this Indictment, Defendants **MARLON MICHAEL BRUFF, a/k/a "Big Bro,"** [REDACTED] **RAMARO ALSWORTH HIGGINS, a/k/a "Dre,"** and [REDACTED] recruited, paid, and received firearms from straw purchasers;
- b. From in or about June of 2020, and continuing thereafter, up to and including the date of this Indictment, Defendant **LIONEL MARTIN ROSENADA CABALLERO, a/k/a "Mr. Hustler,"** straw purchased firearms and transferred

them to Defendants **MARLON MICHAEL BRUFF, a/k/a “Big Bro,”** and

[REDACTED]

- c. On or about March 5, 2021, Defendant **LIONEL MARTIN ROSENADA CABALLERO, a/k/a “Mr. Hustler,”** sold five (5) firearms to Defendant

[REDACTED]

These firearms had been purchased by Defendant **LIONEL MARTIN ROSENADA CABALLERO, a/k/a “Mr. Hustler,”** from a Federal Firearms Licensee (FFL) earlier in the day on March 5, 2021;

- d. On or about March 8, 2021, Defendant **LIONEL MARTIN ROSENADA CABALLERO, a/k/a “Mr. Hustler,”** sold a Glock, model 42, .380 caliber pistol and a Ruger, model LC9, 9mm pistol, to Defendant [REDACTED]

[REDACTED]

Defendant **LIONEL MARTIN ROSENADA CABALLERO, a/k/a “Mr. Hustler,”** purchased the Glock, model 42, .380 caliber pistol from an FFL on or about March 7, 2021;

- e. Beginning on March 10, 2021, and continuing until June 9, 2021, Defendant **LIONEL MARTIN ROSENADA CABALLERO, a/k/a “Mr. Hustler,”** straw purchased 20 firearms from FFLs in Georgia and transferred them to Defendants **MARLON MICHAEL BRUFF, a/k/a “Big Bro”** and [REDACTED]

[REDACTED]

- f. On a date unknown to the grand jury, but between June of 2020, and June 14, 2021, Defendant [REDACTED] picked up approximately \$16,000 in cash from Defendant **MARLON MICHAEL BRUFF, a/k/a “Big**

**Bro,”** in Maryland and transported the cash to Georgia, where she gave it to Defendant **LIONEL MARTIN ROSENADA CABALLERO, a/k/a “Mr. Hustler,”** to pay for guns;

- g. Beginning on a date unknown to the grand jury, but including the period of time between June of 2020, and June 14, 2021, Defendants **MARLON MICHAEL BRUFF, a/k/a “Big Bro”** and **RAMARO ALSWORTH HIGGINS, a/k/a “Dre,”** provided guns to individuals unknown to the grand jury, who picked up the guns at Harsens Island in the state of Michigan, and then smuggled the guns into Canada;
- h. On or around December 5, 2020, Defendants **MARLON MICHAEL BRUFF, a/k/a “Big Bro”** and **RAMARO ALSWORTH HIGGINS, a/k/a “Dre,”** traveled to the vicinity of Harsens Island, Michigan, to facilitate the smuggling of items, including guns, into Canada;
- i. Beginning in April of 2021, and continuing through June of 2021, Defendant [REDACTED] reserved several VRBO and Airbnb rentals in the vicinity of Harsens Island, Michigan;
- j. On or around April 25, 2021, Defendant **MARLON MICHAEL BRUFF, a/k/a “Big Bro,”** traveled to the vicinity of Harsens Island, Michigan, to facilitate the smuggling of items, including guns, into Canada;
- k. On or around April 28, 2021, Defendant **MARLON MICHAEL BRUFF, a/k/a “Big Bro,”** traveled to the vicinity of Harsens Island, Michigan, to facilitate the smuggling of items, including guns, into Canada;

- l. Since April 16, 2021, 15 firearms that were purchased by Defendant **LIONEL MARTIN ROSENADA CABALLERO, a/k/a “Mr. Hustler,”** from FFLs in Georgia between January 29, 2021, and May 19, 2021, have been recovered by law enforcement in Canada;
- m. Beginning on May 16, 2021, and continuing until June 11, 2021, individuals known to the grand jury straw purchased 36 firearms from FFLs in and around Fort Lauderdale and Pompano Beach, Florida. The firearms were then transferred to Defendants **MARLON MICHAEL BRUFF, a/k/a “Big Bro”** and [REDACTED] and transported through the District of South Carolina;
- n. Beginning at a time unknown to the grand jury, but beginning at least in or around June of 2020, and continuing thereafter, up to and including the date of this Indictment, Defendant [REDACTED] obliterated the serial numbers on numerous firearms that he subsequently transferred to Defendant **MARLON MICHAEL BRUFF, a/k/a “Big Bro”**;
- o. From in or about June of 2020, and continuing thereafter, up to and including June 14, 2021, Defendant [REDACTED] acquired firearms and transferred them to Defendants **MARLON MICHAEL BRUFF, a/k/a “Big Bro”** and [REDACTED];
- p. On June 13, 2021, Defendant [REDACTED] purchased a Sig Sauer, model P365, 9mm pistol from individuals in Simpsonville, South Carolina;



- q. On or about June 14, 2021, Defendant **MARLON MICHAEL BRUFF, a/k/a “Big Bro,”** reserved a room at the Country Inn and Suites in Anderson, South Carolina, for two guests under the name of Defendant [REDACTED]
- r. On or about June 14, 2021, Defendant [REDACTED] met Defendant **MARLON MICHAEL BRUFF, a/k/a “Big Bro,”** at the Country Inn and Suites in Anderson, South Carolina, and transferred the firearms to Defendant **MARLON MICHAEL BRUFF, a/k/a “Big Bro,”** including a Sig Sauer, model P365, 9mm pistol;
- s. On or about June 14, 2021, Defendant **MARLON MICHAEL BRUFF, a/k/a “Big Bro,”** met Defendants [REDACTED] and [REDACTED] at the Country Inn and Suites in Anderson, South Carolina and transferred guns into a black Mercedes Sprinter van. The van, which was registered to Defendant **MARLON MICHAEL BRUFF, a/k/a “Big Bro,”** was driven by Defendants [REDACTED] and [REDACTED] Defendant **MARLON MICHAEL BRUFF, a/k/a “Big Bro,”** directed Defendants [REDACTED] and [REDACTED] to get on the road and drive towards Maryland;
- t. On or about June 14, 2021, Defendants [REDACTED] and [REDACTED] drove the black Mercedes Sprinter van containing 73 firearms, including 36 firearms with obliterated serial numbers, toward Maryland, until they were stopped by a police officer in Duncan, South Carolina, and the guns were discovered;



- u. On or about June 14, 2021, Defendant **MARLON MICHAEL BRUFF, a/k/a “Big Bro,”** drove a white Dodge Hellcat and followed the black Mercedes Sprinter van containing the firearms until the black Mercedes Sprinter van was stopped by a police officer in Duncan, South Carolina, and the guns were discovered;
- v. On or around June 15, 2021, Defendant **MARLON MICHAEL BRUFF, a/k/a “Big Bro,”** alerted Defendant **LIONEL MARTIN ROSENADA CABALLERO, a/k/a “Mr. Hustler,”** that his courier had been intercepted;
- w. On or around June 15, 2021, Defendant **LIONEL MARTIN ROSENADA CABALLERO, a/k/a “Mr. Hustler,”** filed a false police report with the Winder Police Department reporting that 44 firearms had been stolen from his home, when in fact these firearms had been sold and transferred to Defendants **MARLON MICHAEL BRUFF, a/k/a “Big Bro”** and [REDACTED] and [REDACTED] and
- x. Counts 2-5 are incorporated herein, as if set forth verbatim, as overt acts.

All in violation of Title 18, United States Code, Section 371.

COUNT 2

THE GRAND JURY FURTHER CHARGES:

That on or about June 14, 2021, in the District of South Carolina, Defendant **MARLON MICHAEL BRUFF, a/k/a “Big Bro,”** knowingly possessed the following firearms in and affecting commerce:

1. Smith & Wesson, model M&P 9 Shield, 9mm pistol;
2. Smith & Wesson, model SD9, 9mm pistol;
3. Glock, model 43x, 9mm pistol;
4. Sig Sauer, model P250, 9mm pistol;
5. SCCY Industries, model CPX-2, 9mm pistol;
6. SCCY Industries, model CPX-2, 9mm pistol;
7. Taurus, model TH40, .40 caliber pistol;
8. Taurus, model G3, 9mm pistol;
9. Glock, model 48, 9mm pistol;
10. Glock, model 43, 9mm pistol;
11. Smith & Wesson, model M&P 9 Shield Plus, 9mm pistol;
12. Smith & Wesson, model SD9, 9mm pistol;
13. Taurus, model G2C, 9mm pistol;
14. SCCY Industries, model CPX-2, 9mm pistol;
15. Taurus, model G2C, 9mm pistol;
16. SCCY Industries, model CPX-2, 9mm pistol;
17. Glock, model 21, .45 caliber pistol;
18. Taurus, model G2C, 9mm pistol;
19. Glock, model 26, 9mm pistol;
20. Taurus, model G2C, 9mm pistol;
21. Glock, model 19, 9mm pistol;
22. Glock, model 19, 9mm pistol;
23. Taurus, model G2C, 9mm pistol;
24. Glock, model 19, 9mm pistol;
25. Glock, model 19, 9mm pistol;
26. Taurus, model G2C, 9mm pistol;
27. Taurus, model G3C, 9mm pistol;
28. FMK Firearms, model 9C1, 9mm pistol;
29. Glock, model 19, 9mm pistol;
30. Glock, model 19, 9mm pistol;
31. Taurus, model G3, 9mm pistol;
32. Taurus, model G3, 9mm pistol;
33. Taurus, model G2C, 9mm pistol;

34. Taurus, model G2C, 9mm pistol;
35. Taurus, model G2C, 9mm pistol;
36. Taurus, model G2C, 9mm pistol;
37. FMK Firearms, model 9C1, 9mm pistol;
38. Glock, model 19, 9mm pistol;
39. Glock, model 19, 9mm pistol;
40. Glock, model 19, 9mm pistol;
41. Glock, model 19, 9mm pistol;
42. Glock, model 19, 9mm pistol;
43. Glock, model 19, 9mm pistol;
44. Glock, model 19, 9mm pistol;
45. Taurus, model G2C, 9mm pistol;
46. Taurus, model G2C, 9mm pistol;
47. Taurus, model G2C, 9mm pistol;
48. Taurus, model G2C, 9mm pistol;
49. Glock, model 19, 9mm pistol;
50. FMK Firearms, model 9C1, 9mm pistol;
51. FMK Firearms, model 9C1, 9mm pistol;
52. Glock, model 19, 9mm pistol;
53. Taurus, model G2C, 9mm pistol;
54. Smith & Wesson, model SD40VE, .40 caliber pistol;
55. FMK Firearms, model 9C1, 9mm pistol;
56. FMK Firearms, model 9C1, 9mm pistol;
57. Colt, model Officers ACP, .45 caliber pistol;
58. Beretta, model PX4 Storm, 9mm pistol;
59. Colt, model Lightweight Gov't, .45 caliber pistol;
60. Smith & Wesson, model M&P 40, .40 caliber pistol;
61. Walther, model PPS, 9mm pistol;
62. Polymer80 Inc., model PF940C, 9mm pistol;
63. SCCY Industries, model CPX-1, 9mm pistol;
64. Smith & Wesson, model M&P 9, 9mm pistol;
65. Sig Sauer, model P365, 9mm pistol;
66. HS Product, model XD9, 9mm pistol;
67. Glock, model 22, .40 caliber pistol;
68. Sig Sauer, model P320, 9mm pistol;
69. Polymer80 Inc., model PF59, 9mm pistol;
70. Sig Sauer, model P365, 9mm pistol;
71. Israel Weapon Ind. (IWI), model Jericho IIM, 9 mm pistol;
72. Sarsilmaz (Sar Arms), model SAR 9, 9mm pistol; and
73. Glock, model 17, 9mm pistol;

having previously been convicted of a crime punishable by imprisonment for a term exceeding one year, and knowing that he had been convicted of such a crime;

In violation of Title 18, United States Code, Sections 922(g)(1), 924(a)(2), and 924(e).

COUNT 3

THE GRAND JURY FURTHER CHARGES:

That on or about June 14, 2021, Defendant [REDACTED], while being employed by and for Defendant **MARLON MICHAEL BRUFF, a/k/a “Big Bro,”** had knowledge that Defendant **MARLON MICHAEL BRUFF, a/k/a “Big Bro,”** had previously been convicted of a crime punishable by imprisonment for a term exceeding one year, did, in the course of such employment, knowingly receive, possess, and transport the following firearms in and affecting interstate and foreign commerce, and did receive the following firearms, which had been shipped and transported in interstate and foreign commerce:

1. Smith & Wesson, model M&P 9 Shield, 9mm pistol;
2. Smith & Wesson, model SD9, 9mm pistol;
3. Glock, model 43x, 9mm pistol;
4. Sig Sauer, model P250, 9mm pistol;
5. SCCY Industries, model CPX-2, 9mm pistol;
6. SCCY Industries, model CPX-2, 9mm pistol;
7. Taurus, model TH40, .40 caliber pistol;
8. Taurus, model G3, 9mm pistol;
9. Glock, model 48, 9mm pistol;
10. Glock, model 43, 9mm pistol;
11. Smith & Wesson, model M&P 9 Shield Plus, 9mm pistol;
12. Smith & Wesson, model SD9, 9mm pistol;
13. Taurus, model G2C, 9mm pistol;

14. SCCY Industries, model CPX-2, 9mm pistol;
15. Taurus, model G2C, 9mm pistol;
16. SCCY Industries, model CPX-2, 9mm pistol;
17. Glock, model 21, .45 caliber pistol;
18. Taurus, model G2C, 9mm pistol;
19. Glock, model 26, 9mm pistol;
20. Taurus, model G2C, 9mm pistol;
21. Glock, model 19, 9mm pistol;
22. Glock, model 19, 9mm pistol;
23. Taurus, model G2C, 9mm pistol;
24. Glock, model 19, 9mm pistol;
25. Glock, model 19, 9mm pistol;
26. Taurus, model G2C, 9mm pistol;
27. Taurus, model G3C, 9mm pistol;
28. FMK Firearms, model 9C1, 9mm pistol;
29. Glock, model 19, 9mm pistol;
30. Glock, model 19, 9mm pistol;
31. Taurus, model G3, 9mm pistol;
32. Taurus, model G3, 9mm pistol;
33. Taurus, model G2C, 9mm pistol;
34. Taurus, model G2C, 9mm pistol;
35. Taurus, model G2C, 9mm pistol;
36. Taurus, model G2C, 9mm pistol;
37. FMK Firearms, model 9C1, 9mm pistol;
38. Glock, model 19, 9mm pistol;
39. Glock, model 19, 9mm pistol;
40. Glock, model 19, 9mm pistol;
41. Glock, model 19, 9mm pistol;
42. Glock, model 19, 9mm pistol;
43. Glock, model 19, 9mm pistol;
44. Glock, model 19, 9mm pistol;
45. Taurus, model G2C, 9mm pistol;
46. Taurus, model G2C, 9mm pistol;
47. Taurus, model G2C, 9mm pistol;
48. Taurus, model G2C, 9mm pistol;
49. Glock, model 19, 9mm pistol;
50. FMK Firearms, model 9C1, 9mm pistol;
51. FMK Firearms, model 9C1, 9mm pistol;
52. Glock, model 19, 9mm pistol;
53. Taurus, model G2C, 9mm pistol;
54. Smith & Wesson, model SD40VE, .40 caliber pistol;
55. FMK Firearms, model 9C1, 9mm pistol;
56. FMK Firearms, model 9C1, 9mm pistol;

57. Colt, model Officers ACP, .45 caliber pistol;
58. Beretta, model PX4 Storm, 9mm pistol;
59. Colt, model Lightweight Gov't, .45 caliber pistol;
60. Smith & Wesson, model M&P 40, .40 caliber pistol;
61. Walther, model PPS, 9mm pistol;
62. Polymer80 Inc., model PF940C, 9mm pistol;
63. SCCY Industries, model CPX-1, 9mm pistol;
64. Smith & Wesson, model M&P 9, 9mm pistol;
65. Sig Sauer, model P365, 9mm pistol;
66. HS Product, model XD9, 9mm pistol;
67. Glock, model 22, .40 caliber pistol;
68. Sig Sauer, model P320, 9mm pistol;
69. Polymer80 Inc., model PF59, 9mm pistol;
70. Sig Sauer, model P365, 9mm pistol;
71. Israel Weapon Ind. (IWI), model Jericho IIM, 9 mm pistol;
72. Sarsilmaz (Sar Arms), model SAR 9, 9mm pistol; and
73. Glock, model 17, 9mm pistol;

In violation of Title 18, United States Code, Sections 922(h) and 924(a)(2).

COUNT 4

THE GRAND JURY FURTHER CHARGES:

That on or about June 14, 2021, in the District of South Carolina, Defendants

**MARLON MICHAEL BRUFF, a/k/a "Big Bro,"** and [REDACTED]

[REDACTED] knowingly possessed the following firearms:

1. Glock, model 19, 9mm pistol;
2. Glock, model 19, 9mm pistol;
3. Taurus, model G2C, 9mm pistol;
4. Glock, model 19, 9mm pistol;
5. Glock, model 19, 9mm pistol;
6. Taurus, model G2C, 9mm pistol;
7. Taurus, model G3C, 9mm pistol;
8. FMK Firearms, model 9C1, 9mm pistol;
9. Glock, model 19, 9mm pistol;
10. Glock, model 19, 9mm pistol;
11. Taurus, model G3, 9mm pistol;

12. Taurus, model G3, 9mm pistol;
13. Taurus, model G2C, 9mm pistol;
14. Taurus, model G2C, 9mm pistol;
15. Taurus, model G2C, 9mm pistol;
16. Taurus, model G2C, 9mm pistol;
17. FMK Firearms, model 9C1, 9mm pistol;
18. Glock, model 19, 9mm pistol;
19. Glock, model 19, 9mm pistol;
20. Glock, model 19, 9mm pistol;
21. Glock, model 19, 9mm pistol;
22. Glock, model 19, 9mm pistol;
23. Glock, model 19, 9mm pistol;
24. Glock, model 19, 9mm pistol;
25. Taurus, model G2C, 9mm pistol;
26. Taurus, model G2C, 9mm pistol;
27. Taurus, model G2C, 9mm pistol;
28. Taurus, model G2C, 9mm pistol;
29. Glock, model 19, 9mm pistol;
30. FMK Firearms, model 9C1, 9mm pistol;
31. FMK Firearms, model 9C1, 9mm pistol;
32. Glock, model 19, 9mm pistol;
33. Taurus, model G2C, 9mm pistol;
34. Smith & Wesson, model SD40VE, .40 caliber pistol;
35. FMK Firearms, model 9C1, 9mm pistol; and
36. FMK Firearms, model 9C1, 9mm pistol;

that had been shipped and transported in interstate and foreign commerce, from which the manufacturer's serial number had been removed, altered, and obliterated;

In violation of Title 18, United States Code, Sections 922(k) and 924(a)(1)(B).



COUNT 5

THE GRAND JURY FURTHER CHARGES:

That beginning at a time unknown to the grand jury, and continuing until on or about June 14, 2021, in the District of South Carolina, Defendant [REDACTED] not being a licensed dealer of firearms within the meaning of Chapter 44, Title 18, United States Code, did willfully engage in the business of dealing in firearms;

In violation of Title 18, United States Code, Sections 922(a)(1)(A), 923(a), and 924(a)(1)(D).

COUNT 6

THE GRAND JURY FURTHER CHARGES:

That beginning at a time unknown to the grand jury, but beginning at least in or around May of 2021, and continuing thereafter, up to and including the date of this Indictment, in the District of South Carolina, Defendants **MARLON MICHAEL BRUFF, a/k/a "Big Bro," RAMARO ALSWORTH HIGGINS, a/k/a "Dre,"** [REDACTED] [REDACTED] knowingly and intentionally did combine, conspire, and agree and have tacit understanding with each other and with others, both known and unknown to the grand jury, to knowingly, intentionally and unlawfully possess with intent to distribute and to distribute marijuana, a Schedule I controlled substance:

- a. With respect to Defendant **MARLON MICHAEL BRUFF, a/k/a "Big Bro,"** the amount involved in the conspiracy attributable to him as a result of his own conduct, and the conduct of other conspirators reasonably

foreseeable to him, is a quantity of marijuana, in violation of Title 21, United States Code, Sections 841(a)(1) and 841(b)(1)(D);

- b. With respect to Defendant **RAMARO ALSWORTH HIGGINS, a/k/a "Dre,"** the amount involved in the conspiracy attributable to him as a result of his own conduct, and the conduct of other conspirators reasonably foreseeable to him, is a quantity of marijuana, in violation of Title 21, United States Code, Sections 841(a)(1) and 841(b)(1)(D);
- c. With respect to Defendant [REDACTED] the amount involved in the conspiracy attributable to her as a result of her own conduct, and the conduct of other conspirators reasonably foreseeable to her, is a quantity of marijuana, in violation of Title 21, United States Code, Sections 841(a)(1) and 841(b)(1)(D); and
- d. With respect to Defendant [REDACTED] the amount involved in the conspiracy attributable to him as a result of his own conduct, and the conduct of other conspirators reasonably foreseeable to him, is a quantity of marijuana, in violation of Title 21, United States Code, Sections 841(a)(1) and 841(b)(1)(D);

All in violation of Title 21, United States Code, Section 846.

COUNT 7

That on or about June 14, 2021, in the District of South Carolina, Defendants **MARLON MICHAEL BRUFF, a/k/a “Big Bro,”** [REDACTED] and [REDACTED] as principals, aiders and abettors, and as co-participants in jointly undertaken criminal activity, knowingly, intentionally and unlawfully did possess with intent to distribute a quantity of marijuana, a Schedule I controlled substance;

In violation of Title 21, United States Code, Sections 841(a)(1) and 841(b)(1)(D), and Title 18, United States Code, Section 2.

**FORFEITURE**

**DRUG OFFENSES:**

Upon conviction for felony violations of Title 21, United States Code, as charged in this Indictment, Defendants **MARLON MICHAEL BRUFF, a/k/a “Brando,”**  
**RAMARO ALSWORTH HIGGINS, a/k/a “Dre,”** [REDACTED]

[REDACTED] shall forfeit to the United States all of the Defendants’ rights, title, and interest in and to any property, real and personal,

- A. constituting, or derived from any proceeds the Defendants obtained, directly or indirectly, as the result of such violation of Title 21, United States Code, and all property traceable to such property, and/or;
- B. used or intended to be used, in any manner or part, to commit or to facilitate the commission of such violation of Title 21, United States Code.

**PROPERTY:**

Pursuant to Title 21, United States Code, Sections 853 and 881, and Title 28, United States Code, Section 2461(c), the property which is subject to forfeiture upon conviction of the Defendants for the offenses charged in this Indictment includes, but is not limited to, the following:

**Proceeds/Forfeiture Judgment:**

A sum of money equal to all property the Defendants obtained as a result of the drug offenses charged in this Indictment, and all interest and proceeds traceable thereto as a result of their violations of 21 U.S.C. §§ 841 and 846.

SUBSTITUTION OF ASSETS:

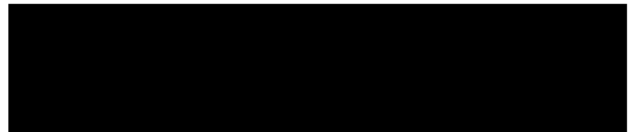
If any of the property described above as being subject to forfeiture, as a result of any act or omission of the Defendants:

- A. cannot be located upon the exercise of due diligence;
- B. has been transferred or sold to, or deposited with, a third person;
- C. has been placed beyond the jurisdiction of the Court;
- D. has been substantially diminished in value; or
- E. has been commingled with other property which cannot be subdivided without difficulty;

it is the intent of the United States, pursuant to Title 21, United States Code, Section 853(p) to seek forfeiture of any other property of Defendants up to an amount equivalent to the value of the above-described forfeitable property;

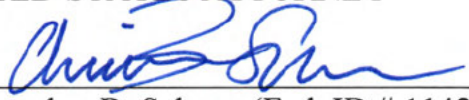
Pursuant to Title 21, United States Code, Sections 853 and 881, and Title 28, United States Code, Section 2461(c).

A True BILL



FOREPERSON

ADAIR F. BOROUGHS  
UNITED STATES ATTORNEY

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